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(1947-2018)

VIA ECF AND EMAIL

The Honorable Sarah Netburn
United States Magistrate Judge
United States District Court for the
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007
Email: Netburn_NYSDChambers@nysd.uscourts.gov

Re: *Patricia Ryan, in her own right and as Executrix of the Estate of John J. Ryan, deceased; Kristen Ryan; Laura Ryan; Colin Ryan; Katherine Maher, in her own right and as Executrix of the Estate of Daniel L. Maher, deceased; Daniel R. Maher; Joseph F. Maher; Kristen Breitweiser, in her own right and as Administratrix of the Estate of Ronald Breitweiser, deceased; Caroline Breitweiser; Patricia D. Casazza, in her own right and as Administratrix of the Estate of John Francis Casazza, deceased; John F. Casazza; Mindy Kleinberg, in her own right and as Administratrix of the Estate of Alan D. Kleinberg, deceased; Lauren Nicole Kleinberg; Jacob Kleinberg; Sam Eric Kleinberg; Lorie Van Auken, in her own right and as Executrix of the Estate of Kenneth Van Auken, deceased; Sarah Van Auken; and Matthew Van Auken ("Ryan Plaintiffs") v. The Islamic Republic of Iran, et. al.*

Dear Judge Netburn:

Pursuant to your Order, dated November 26, 2019 (Doc. 5312), we are submitting this status letter indicating how the above-referenced Plaintiffs (the "Ryan Plaintiffs") will be removed from their current complaints.

The *Ryan Plaintiffs* have retained attorneys who are currently and previously representing the *Havlish*, *Hoglan*, and *Ray Plaintiffs*.

Your Honor has granted the prior attorneys for the *Ryan Plaintiffs* to withdraw and has also granted the Motions to Substitute Counsel (*see* Text Orders at Docs. 5098, 5099, 5156, 5157, and 5312).

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All of the *Ryan* Plaintiffs are similarly situated in that they were represented by different attorneys and their claims were filed in different complaints. In order to be consistent and in compliance with the Court's Order, we will be filing a motion to remove and transfer the claims from their current complaints and establishing them in a new Complaint to be entitled *Ryan, et al. v. The Islamic Republic of Iran, et al.* While their current complaints name three defendants, the newly established Complaint will also name 13 other Iranian defendants, which is of paramount importance for enforcement and collection of the judgments abroad. Whereas, the *Ryan* Plaintiffs have previously received judgments against three defendants, the newly established Complaint will seek a judgment against all 16 Iranian defendants in favor of the *Ryan* Plaintiffs, as was the case in *Havlish* and *Hoglan*.

Counsel for the *Ryan* Plaintiffs are currently vetting the Complaint and we respectfully request the Court to allow the *Ryan* Plaintiffs until January 6, 2020 to file a motion to remove and transfer from their current complaints into a newly filed *Ryan, et al.* Complaint, consistent with your Order and consistent with the directions of our clients.

Respectfully Submitted,

/s/ Dennis G. Pantazis

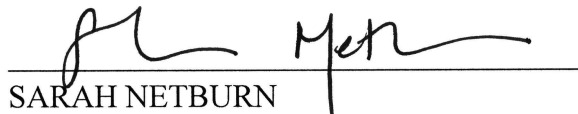
Dennis G. Pantazis

cc: All counsel of record via ECF

Counsels' request for a January 6, 2020 deadline to file a motion to remove and transfer from their current complaints into a newly filed *Ryan, et al.* Complaint is GRANTED.

SO ORDERED.

December 19, 2019
New York, New York


SARAH NETBURN
United States Magistrate Judge